Revised 12/03

CORRES CONTROL
INCOMING LTR NO

0 L L 9 RF 03

DUE DATE

ACTION

DIST	LTR	ENC
BERARDINI J H	X	
BOGNAR, E S	X	
BROOKS L		
BUTLER L	X	
CARPENTER M	X	
CROCKETT G A		
DECK C A	X	
DEGENHART K R		
DIETER T J		
DIETERLE S E		
FERRERA D W		
GIACOMINI J J		
LINDSAY D C		
LONG J W		
LYLE J L		
MARTINEZ, L A	X	
NAGEL, R E	X	
NESTA S		
NORTH K	X	
PARKER A M		
RODGERS A D		
SHELTON D C	X	
SPEARS M S		
TRICE K D		
TUOR N R		
WIEMELT K		
WILLIAMS J L		
ZAHM C	X	

COR CONTROL	X	
ADMIN RECORD	X	
PATS/130		

Reviewed for Addressee
Corres Control RFP

12/24/03 DRR

Date By

Ref Ltr #

DOE ORDER #

5400.1

STATE OF COLORADO

Bill Owens, Governor
Douglas H Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr S
Denver, Colorado 80246-1530
Phone (303) 692-2000
TDD Line (303) 691-7700
Located in Glendale, Colorado

http://www cdphe state co us

Laboratory and Radiation Services Division
8100 Lowry Blvd
Denver Colorado 80230 6928
(303) 692-3090

Colorado Department
of Public Health
and Environment

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2003 DEC 23 P 2:32
CORRESPONDENCE CONTROL

December 17, 2003

Mr Joseph Legare
Assistant Manager for Environment and Stewardship
U S Department of Energy
Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

RE **Final Approval, Data Summary Report, IHSS Group 900-3 (904 Pad), dated November 2003**

Dear Mr Legare

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) hereby grants final approval for the subject report and, as a consequence, No Further Accelerated Action (NFAA) for the 904 Pad The Division previously granted conditional approval for NFAA subject to sampling of native soils believed to have been contaminated by wind blown releases of radionuclides from the 903 Pad The additional sampling has been satisfactorily completed

A comment resolution meeting, stemming from the inclusion of the new data, occurred on December 12, 2003 Based on the meeting, the document may now be finalized For completeness, the additional set of comments is attached

The new data should also be included in the closeout report for the 903 Pad and/or Inner Lip Agreement on this objective was made at a meeting, including the project coordinators, on September 24, 2003 and reiterated in the conditional approval letter of September 30, 2003

We look forward to verifying the content of the revised final report If you have any questions regarding this correspondence, please contact me at (303) 692-3367 or Harlen Ainscough at 303-692-3337

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

Attachment

cc Mark Aguilar, EPA
Norma Castaneda, DOE
Lane Butler, KH
Mark Sattelberg, U S F&W
Dave Shelton, KH
Administrative Records Building T130G

H \RFETS\900-3 (904 Pad) App NFAA.doc

DEC 2003
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DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
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ADMIN RECORD

IA-A-001887

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Data Summary Report
IHSS Group 900-3
(904 Pad)

November 2003

General Comment

1 Several of the specific comments provide suggested language as a means to expeditiously address the Division's remaining concerns

Specific Comments

2 Section 2 0 1st para , last sent – Suggested change, "It should be noted that some samples contained road base material, or a mixture of road base and native material, due to the difficulty of differentiating the material types

3 3rd para ,– Suggested change, "Additional sampling and analysis was performed in October 2003 This sampling event was supplemental to the initial IHSS Group 900-3 investigation, which was conducted in January 2003 The second sampling event became necessary due to uncertainty from the preceding sampling effort, noted above, and data from a 1989 report entitled *Interim Status Closure Plan, Solid Waste Management Unit 15*Storage*Pad 904* (Rockwell International, 1989) The closure reported revealed two potential radiological "hot spots" in the northeastern corner of the 904 Pad Confirmation samples collected after the excavation of contaminated soil and prior to construction of the 904 Pad in 1987 indicated that the two locations had residual plutonium activities in the 60-pCi/g range Road base was placed across the site prior to construction of the 904 Pad, therefore, it was necessary to determine whether the native soil in the northeastern portion of the site contained elevated plutonium activities

4 Figure 2 Some of the eleven samples collected in October 2003 are shown to have exceedances of an ecological action level This is contrary to the statement in the first bullet on page 37 (Receipt of a revised map is acknowledged)

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5 Table 1 On page 10, the October 2003 samples are shown as having been collected from 0 0 to 0 5 feet Although this was the planned depth, the size of the core barrel and the need for a greater volume of soil for laboratory purposes resulted in some increments being from 0 0 to 1 0 feet Please report the actual increment sampled and analyzed

6. Table 5 The "Comment" column still contains reference to "Sample depth variation " for many of the boring locations The comment was, but is no longer, appropriate considering the manner in which the intervals were reported in the draft document Please delete or modify the comment

7 Section 4 1 2 1st para , page 40 - The Division is pleased with the acknowledgement that quality control samples must yield satisfactory results, not merely be conducted at a minimum frequency The Data Summary Report for IHSS Group 400-3, and others, have failed to acknowledge the performance requirements and failed, in some instances, to address frequency and tolerance issues

8 Section 4 1 3 Suggested language,

"Laboratory Control Sample Evaluation

The frequency of Laboratory Control Sample (LCS) measurements, relative to each laboratory batch, is given in Table 6 LCS frequency was adequate based on at least one LCS per laboratory batch The minimum and maximum LCS results are tabulated by

chemical and method for the project Any qualifications of analytical data due to LCS results falling outside tolerance limits are captured in the V&V flags, described in the Completeness Section "

Additionally, please state the LCS tolerance limits in the narrative or add a footnote to Table 6 This request applies to each parameter with a standard or project specific tolerance limit that is required, or desirable, to be met

9 Suggested language, "*Sample Matrix Spike Evaluation*

The frequency of MS measurements was adequate based on at least one MS per laboratory batch The minimum and maximum MS results are summarized by chemical for the entire project in Table 9 MS recoveries, outside of control limits, alone do not result in rejection of data" [PLEASE STATE OR PROVIDE AN EXAMPLE TO SUPPORT THIS STATEMENT] "Qualifications due to matrix spike performance are included in the V&V flags summarized in the Completeness Section "

10 Table 9 The low Matrix Spike recoveries for 1,2,4-Trichlorobenzene and Napthalene are reflected in the exceedance of RPD limits (35%) in Table 10 Please discuss this effect in Section 4 1 4

11 Section 4 1 4 page 46 - In the narrative, please acknowledge that nitrate duplicate frequencies were at 4 88%, a minor exception Delete "greater than" in the last sentence, 1,000,000 is the AL

12 Page 48 – Suggested language, "The Validation percentages given in Table 13 indicate that frequency goals were not attained for all analytical suites This is merely a processing delay, the flags have not yet been uploaded to the RFETS SWD Visual spot checks on flags applied to radionuclide results in hardcopy data packages indicate at least a 50 percent frequency Other analytical suites such as radionuclides, cyanides and anions were verified at relatively high frequencies (greater than 25 percent) "

Please add a clarifying footnote to table 13